

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2019 JUL 18 PM 1:18

EC

UNITED STATES OF AMERICA

NO. 3:18-CR-00595-L

v.

HELEN KIM

FACTUAL RESUME

In support of Helen Kim's plea of guilty to the offense in Count One of the Superseding Information, Kim, the defendant, Cody Skipper, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count One of the Superseding Information, charging a violation of 18 U.S.C. § 1952(a)(3), that is, use of a facility of interstate commerce in aid of a racketeering enterprise, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant used a facility in interstate or foreign commerce;
- Second.* That the defendant did so with the specific intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment or carrying on, of any unlawful activity; and
- Third.* That subsequent to the use of a facility of interstate or foreign commerce, the defendant did knowingly and willfully promote, manage, establish, or carry on such unlawful activity.

¹ Fifth Circuit Pattern Jury Instruction 2.74 (5th Cir. 2015).

STIPULATED FACTS

1. Beginning no later than January 2015, and continuing through on or about November 20, 2018, the exact dates being unknown, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, Helen Kim along with others both known and unknown, did knowingly and willfully use and cause to be used facilities of interstate commerce, namely cellular telephones, the internet, and automated teller machines, among others, with the specific intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is a business enterprise involving prostitution in violation of Texas Penal Code § 43.04, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

2. Helen Kim admits that she owned and operated two brothels that provided commercial sex to customers: Pink One Spa and Illusion Spa. Collectively, Pink One Spa and Illusion Spa employed more than 10 commercial sex workers at a time, and many of the commercial sex workers lived at the brothels. This was done, in part, so that commercial sex workers could cater to customers at all times of the day. Kim admits that she supervised and managed more than five individuals—coconspirators—at Pink One Spa and Illusion Spa.

3. Helen Kim further admits that she used the facilities in interstate commerce to promote her commercial sex operation, including the internet, cellular telephones, and automated teller machines. Specifically, Helen Kim used and caused others to use

cellular telephones to book appointments for clients to engage in commercial sex. Helen Kim also directed customers and caused others to direct customers to pay for commercial sex in cash.

4. In October 2018, Helen Kim recruited over fifteen commercial sex workers to engage in commercial sex acts with “businessmen” coming to town. Helen Kim admits that the commercial sex workers knew that that they—the commercial sex workers—would be expected to provide commercial sex services to the businessmen. Helen Kim did not realize at the time she was recruiting commercial sex workers and negotiating details regarding the commercial sex event, that she was part of a sting operation and that she was negotiating with an undercover detective. On or about November 1, 2018, Helen Kim arrived at a hotel in Dallas, Texas, to receive over \$40,000 in cash in exchange for facilitating the providing of commercial sex services to the businessmen—who were in reality undercover law enforcement.

5. Helen Kim contributed money monthly to a money club. Individual 2, who collected the money, knew that the money contributed monthly came from Helen Kim’s brothels.

6. Helen Kim further admits that the cash seized by investigators during the search warrants of her brothels represented proceeds from owning and operating brothels.

7. Helen Kim agrees that she committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this


statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the Superseding Information.

AGREED TO AND STIPULATED on this 12th day of July, 2019.

ERIN NEALY COX
UNITED STATES ATTORNEY


HELEN KIM
Defendant


CODY SKIPPER
Attorney for Defendant


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